

To: William.H.Miller@usace.army.mil[William.H.Miller@usace.army.mil]
Cc: Sallie.Diebolt@usace.army.mil[Sallie.Diebolt@usace.army.mil]; Brush,
Jason[Brush.Jason@epa.gov]; Scott_Richardson@fws.gov[Scott_Richardson@fws.gov]
From: Nina
Sent: Sat 6/6/2015 4:48:23 PM
Subject: Villages at Vigneto Development Proposal

Dear sir

I am writing to ask you to re-evaluate the Clean Water Act Section 404 permit, initiate consultation with the USFWS to quantify potential impacts of Vigneto to threatened and endangered species and to ensure commitments to adequate conservation and mitigation measures. Two Global Important Bird Areas along the San Pedro River are being threatened by the Villages at Vigneto .

The Clean Water Act Section 404 Permit issued to Whetstone Ranch by the Army Corps of Engineers in 2006 (Permit #2003-00826-SDM) should be re-evaluated for compliance and re-opened to consider changed circumstances and new scientific information that has become available in the past decade. The Villages at Vigneto is a new and a different development proposal than Whetstone Ranch. Whetstone Ranch proposed to build up to 20,000 new housing units on 8,000 acres, while the Villages at Vigneto proposes to build 27,760 housing units on 12,324 acres. Increased impacts to jurisdictional waters from this new proposal will be significantly different and should be re-evaluated.

The Villages at Vigneto poses a potential threat to an EPA-designated Aquatic Resource of National Importance (ARNI), two Global Important Bird Areas on the San Pedro River, the BLM-managed San Pedro Riparian National Conservation Area, the St. David Cienega, numerous mitigation properties located downstream from Vigneto astride the San Pedro River, and the world-class wet cave system at Kartchner Caverns State Park. The sustainability of these vital conservation areas and tourist destinations rely upon having sufficient water quantity and quality. The effects of Vigneto's water use on the San Pedro River could occur many miles away from where water is being pumped, putting our communities, critical wildlife habitats and significant conservation investments at risk.

Please consider this when making decisions.

Thank you
Nina Jones